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7 **UNITED STATES DISTRICT COURT**
8 **FOR THE WESTERN DISTRICT OF WASHINGTON**
9 **AT SEATTLE**

10 C&C OFFSET PRINTING CO. (USA), INC.,)
11 Plaintiff,)
12 -vs-)
13 LONE PINE PUBLISHING COMPANY,)
14 Defendant.)
15 AMAZON.COM, INC.,)
16 Garnishee Defendant)

2:20-mc-00020 RSL

Case No. MS160050

**APPLICATION FOR WRIT OF
GARNISHMENT**

17 As the attorney for the above-named Plaintiff, I make this Application for a Writ of
18 Garnishment on Plaintiff's behalf against Defendant/Judgment Debtor Lone Pine Publishing
19 Company ("Defendant"). The facts are as follows:

20 1. On May 11, 2015, Plaintiff obtained a default judgment (the "Judgment")
21 against Defendant in the total amount of \$98,808.99. The Judgment was entered in the United
22 States District Court, District of Oregon. On or about April 25, 2016, the Judgment was
23 registered in this Court.

24 2. On or about August 7, 2019, in Cause No. 2:19-mc-00102 RSL, Plaintiff
25 obtained a writ of garnishment to serve on Garnishee Defendant Amazon.com, Inc.
26 ("Garnishee"). On October 3, 2019, Garnishee filed an amended answer stating it was holding

1 \$9,520.62 in connection with the writ of garnishment. On November 1, 2019, the Court
 2 entered judgment against Garnishee in the amount of \$9,520.62. On or about February 12,
 3 2020, Plaintiff received this \$9,520.62 from Garnishee.

4 3. Plaintiff is now owed \$95,004.43 under the Judgment. This consists of:

| | |
|---|---------------------------|
| 5 Judgment Amount: | \$98,808.99 |
| 6 Post-Judgment Interest (5/11/15 - 7/31/19): | \$ 5,436.06 |
| 7 Costs Awarded by the Court (11/1/19 Order) | \$ 280.00 |
| 8 Payment by Garnishee Defendant | <u>\$<9,520.62></u> |
| 9 Amount Owed on Judgment | \$95,004.43 |

10 4. Plaintiff is entitled to \$1,288.74 in additional post-judgment interest and costs.

11 This consists of:

| | |
|--|-----------|
| 12 Post-Judgment Interest (8/1/19 - 2/21/20) | \$ 861.74 |
| 13 Filing Fee | \$ 47.00 |
| 14 Estimated Service and Affidavit Fee: | \$ 100.00 |
| 15 Postage and Costs of Certified Mailing: | \$ 10.00 |
| 16 Answer Fee: | \$ 20.00 |
| 17 Garnishment Attorney Fees: | \$ 250.00 |

18 5. Plaintiff has reason to believe and does believe that Garnishee is indebted to
 19 Defendant in amounts exceeding those exempt from garnishment by any state or federal law, or
 20 that Garnishee has possession or control of property or effects belonging to Defendant which
 21 are not exempt from garnishment by any state or federal law.
 22

23 6. Garnishee is not the employer of Defendant.

24 7. The garnishment applied for herewith is not sought to injure the Defendant or
 25 Garnishee.
 26

1 I certify under penalty of perjury under the laws of the State of Washington that the
2 foregoing is true and correct.

3 DATED this 6 day of March, 2020, at Seattle, Washington.

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5 **FINKELSTEIN LAW OFFICE, PLLC**

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7 Fred S. Finkelstein, WSBA# 14340
8 Attorney for Plaintiff/Judgment Creditor
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